

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re

CITY OF DETROIT, MICHIGAN,

Debtor.

Chapter 9

Case No. 13-53846

Hon. Steven W. Rhodes

**Expedited Consideration
Requested**

EX PARTE MOTION FOR SHORTENED NOTICE AND DECISION WITHOUT
HEARING ON EMERGENCY JOINT MOTION OF APPELLANTS JOHN P. QUINN,
DENNIS TAUBITZ AND IRMA INDUSTRIOUS TO INSTRUCT CLERK NOT TO
REQUIRE COPIES OF DOCUMENTS LISTED IN DESIGNATIONS OF RECORD

John P. Quinn (“Quinn”), Dennis Taubitz (“Taubitz”) and Irma Industrious
 (“Industrious”) (collectively “movants,” “we” or “us”) move the Court for shortened notice
and decision without a hearing on the Emergency Joint Motion of Appellants John P.
Quinn, Dennis Taubitz and Irma Industrious to Instruct Clerk not to Require Copies of
Documents Listed in Designations of Record (“Motion to Instruct”). In support of this
motion, the movants say that:

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§
157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue
for this matter is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.
2. Under Bankruptcy Rule 9006(c) and Local Bankruptcy Rule 9001-1(b), the
Court may, *ex parte*, shorten the notice period provided by Local Bankruptcy Rule
9014-1 for a party to take any action or file any paper. Fed.R.Bankr.P. 9006(c),
E.D.Mich. LRB 9006-1(b).
3. As Noted in the Motion to Instruct, the Bankruptcy Clerk has erroneously

notified the movants and other appellants that we must comply with the Clerk's unreasonable and burdensome demand for certain documents within five days of the date of the notices, December 12, 2014. If the Court does not rule on the Motion to Instruct very promptly, we will be forced to comply with that demand even if the Court subsequently grants the Motion to Instruct.

4. This motion is addressed to the Court's broad discretion to "secure the just, speedy, and inexpensive determination of every case and proceeding." Federal Rule of Bankruptcy Procedure 1001.

5. As reflected in the proposed order attached as Exhibit A, we propose the Court consider and decide the Motion to Instruct as expeditiously as possible.

WHEREFORE, we respectfully request entry of the proposed order attached as Exhibit A or of another order acceptable to the Court granting substantially the same relief as that proposed order.

/s/ with consent of John P. Quinn
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/s/ with consent of Dennis Taubitz
Dennis Taubitz
6002 Diamond Ruby – Suite 3
PMB 255
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(313) 271-9842/ (340) 332-0006

Dated: December 13, 2014

/s/ Irma Industrious
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EXHIBIT A
Proposed Order

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re

Chapter 9

CITY OF DETROIT, MICHIGAN,

Case No. 13-53846

Debtor.

Hon. Steven W. Rhodes

ORDER GRANTING *EX PARTE* MOTION FOR SHORTENED NOTICE AND
DECISION WITHOUT HEARING ON EMERGENCY JOINT MOTION OF
APPELLANTS JOHN P. QUINN, DENNIS TAUBITZ AND IRMA INDUSTRIOUS TO
INSTRUCT CLERK NOT TO REQUIRE COPIES OF DOCUMENTS LISTED IN
DESIGNATIONS OF RECORD

The Court has considered the *Ex Parte* Motion for Shortened Notice and Decision Without a Hearing on the Emergency Joint Motion of Appellants John P. Quinn, Dennis Taubitz and Irma Industrious to Instruct Clerk not to Require Copies of Documents Listed in Designations of Record, is fully informed in the matter and has concluded that there is just cause for granting the relief requested.

IT IS ORDERED THAT:

1. The *Ex Parte* Motion is granted.
2. Any party wishing to respond to the Emergency Joint Motion of Appellants John P. Quinn, Dennis Taubitz and Irma Industrious to Instruct Clerk not to Require Copies of Documents Listed in Designations of Record must do so on or before December 16, 2014.
3. The Court will decide the Emergency Joint Motion of Appellants John P. Quinn, Dennis Taubitz and Irma Industrious to Instruct Clerk not to Require Copies of

Documents Listed in Designations of Record without a hearing.

4. The terms and conditions of this Order are immediately effective and enforceable upon its entry.

5. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Steven W. Rhodes
United States Bankruptcy Judge